

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re: Equifax, Inc. Customer  
Data Security Breach Litigation

MDL Docket No. 2800  
No. 1:17-md-2800-TWT

This document relates to:

Chief Judge Thomas W. Thrash, Jr.

**FINANCIAL INSTITUTION ACTIONS**

**JOINT MOTION FOR EXTENSION OF BRIEFING SCHEDULE FOR  
DEFENDANTS' MOTION TO DISMISS THE FINANCIAL  
INSTITUTIONS' CONSOLIDATED AMENDED COMPLAINT**

Plaintiffs in the Financial Institution Actions (“Plaintiffs”) and Defendants Equifax Inc. and Equifax Information Services LLC (“Defendants”) respectfully submit this Joint Motion for Extension of Briefing Schedule for Defendants’ Motion to Dismiss the Financial Institutions’ Consolidated Amended Complaint.

In support of this motion, the parties state as follows:

1. On March 23, 2018, the Court entered Case Management Order No. 3 (Dkt. No. 248), directing Plaintiffs to file a master consolidated complaint by May 30, 2018, and setting forth a briefing schedule for Defendants’ Rule 12(b) motions, with Defendants to file their Rule 12(b) motion on or before July 16, 2018; Plaintiffs to file their opposition on or before August 30, 2018; and Defendants to

file a reply on or before October 1, 2018;

2. On May 30, 2018, Plaintiffs filed their Consolidated Amended Complaint (“CAC”) (Dkt. No. 390);

3. On July 16, 2018, Defendants filed their motion to dismiss the CAC (Dkt No. 435);

4. In its motion to dismiss, Defendants challenge the sufficiency of Plaintiffs’ allegations and raise statutory and constitutional arguments challenging each of the claims Plaintiffs assert;

5. Given the complexity and number of the issues raised in Defendants’ motion to dismiss, the parties respectfully request an extension of time to brief Defendants’ motion to dismiss;

6. Plaintiffs and Defendants have conferred and agreed to jointly request that the briefing on Equifax’s motion to dismiss the CAC be extended as follows:

i. Plaintiffs’ opposition to Defendants’ motion to dismiss to be filed on or before September 20, 2018; and

ii. Defendant’s reply to be filed on or before November 1, 2018.

THEREFORE, the parties respectfully request that the Court grant this Joint Motion and extend the parties’ briefing schedule accordingly. A proposed Order is attached as **Exhibit A**.

Respectfully submitted this 8th day of August, 2018.

/s/ Joseph P. Guglielmo  
Joseph P. Guglielmo  
**SCOTT+SCOTT ATTORNEYS AT  
LAW LLP**  
230 Park Avenue, 17th Floor  
New York, New York 10169  
Tel. 212.223.6444  
jguglielmo@scott-scott.com

Gary F. Lynch  
**CARLSON LYNCH SWEET KILPELA  
& CARPENTER, LLP**  
1133 Penn Avenue, 5th Floor  
Pittsburgh, Pennsylvania 15222  
Tel. 412.322.9243  
glynch@carsonlynch.com

***Financial Institution Plaintiffs' Co-Lead  
Counsel***

Craig A. Gillen  
**GILLEN WITHERS & LAKE, LLC**  
3490 Piedmont Road, N.E.  
One Securities Centre, Suite 1050  
Atlanta, Georgia 30305  
Tel. 404.842.9700  
cgillen@gwllawfirm.com

MaryBeth V. Gibson  
**THE FINLEY FIRM, P.C.**  
3535 Piedmont Road  
Building 14, Suite 230  
Atlanta, Georgia 30305  
Tel. 404.320.9979  
mgibson@thefinleyfirm.com

Ranse Partin  
**CONLEY GRIGGS PARTIN LLP**  
4200 Northside Parkway  
Building One, Suite 300  
Atlanta, Georgia 30327  
Tel. 404.572.4600  
ranse@onleygriggs.com

***Financial Institution Plaintiffs' Co-Liaison  
Counsel***

Arthur M. Murray  
**MURRAY LAW FIRM**  
650 Poydras Street, Suite 2150  
New Orleans, Louisiana 70130  
Tel. 504.525.8100  
amurray@murray-lawfirm.com

Stacey P. Slaughter  
**ROBINS KAPLAN LLP**  
800 LaSalle Avenue, Suite 2800  
Minneapolis, Minnesota 55402  
Tel. 612.349.8500  
sslaughter@robinskaplan.com

Charles H. Van Horn  
**BERMAN FINK VANHORN P.C.**  
3475 Piedmont Road, Suite 1100  
Atlanta, Georgia 30305  
Tel. 404.261.7711  
cvanhorn@bfvlaw.com

Allen Carney  
**CARNEY BATES & PULLIAM, PLLC**  
519 W. 7th Street  
Little Rock, Arkansas 72201  
Tel. 501.312.8500  
acarney@cbplaw.com

Bryan L. Bleichner  
**CHESTNUT CAMBRONNE PA**  
17 Washington Avenue North  
Suite 300  
Minneapolis, Minnesota 55401  
Tel. 612.339.7300  
[bbleichner@chestnutcambronne.com](mailto:bbleichner@chestnutcambronne.com)

Karen Hanson Riebel  
**LOCKRIDGE GRINDAL NAUEN  
P.L.L.P.**  
100 Washington Ave. S., Suite 2200  
Minneapolis, Minnesota 55401  
Tel. 501.812.5575  
[khriebel@locklaw.com](mailto:khriebel@locklaw.com)

Karen S. Halbert  
**ROBERTS LAW FIRM, PA**  
20 Rahling Circle  
P.O. Box 241790  
Little Rock, Arkansas 72223  
Tel. 501.821.5575  
[karenhalbert@robertslawfirm.us](mailto:karenhalbert@robertslawfirm.us)

Brian C. Gudmundson  
**ZIMMERMAN REED LLP**  
1100 IDS Center, 80 South 8th Street  
Minneapolis, Minnesota 55402  
Tel. 612.341.0400  
[brian.gudmunson@zimmreed.com](mailto:brian.gudmunson@zimmreed.com)

*Financial Institution Plaintiffs' Steering Committee*

-and-

/s/ S. Stewart Haskins II (w/ permission)

**KING & SPALDING LLP**

David L. Balser

Georgia Bar No. 035835

Phyllis B. Sumner

Georgia Bar No. 692165

S. Stewart Haskins II

Georgia Bar No. 336104

Elizabeth D. Adler

Georgia Bar No. 558185

John C. Toro

Georgia Bar No. 175145

1180 Peachtree Street, N.E.

Atlanta, Georgia 30309

Tel.: (404) 572-4600

Fax: (404) 572-5140

[dbalser@kslaw.com](mailto:dbalser@kslaw.com)

[psumner@kslaw.com](mailto:psumner@kslaw.com)

[shaskins@kslaw.com](mailto:shaskins@kslaw.com)

[eadler@kslaw.com](mailto:eadler@kslaw.com)

[jtoro@kslaw.com](mailto:jtoro@kslaw.com)

*Counsel for Equifax Inc.*

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1B. This Response was prepared on a computer using the Times New Roman font (14 point).

Respectfully submitted this 8th day of August, 2018.

*/s/ Joseph P. Guglielmo*  
Joseph P. Guglielmo

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

*/s/ Joseph P. Guglielmo*  
Joseph P. Guglielmo